

Implementation Procedure Los Alamos National Laboratory

Environmental Communication Procedure

IMP 402.0

Issue Date 02/24/05 Issuing Authority ADTS, Carolyn Mangeng

Summary

This procedure directs workers on how to communicate environmental matters with internal and external interested parties.

INTRODUCTION

Authority and Applicability

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This procedure is issued under the authority of the Director to direct Los Alamos National Laboratory (LANL) work and to apply University of California (UC) policies. This procedure derives from the LANL Environmental Governing Policy (see Policies and Procedures Manual), in order to implement the requirements of Department of Energy (DOE) Order 450.1 (Environmental Protection Program). The Environmental Stewardship (ENV) Division Leader is the Responsible Manager (RM) for this IMP and the Responsible Office (RO) is the Pollution Prevention and Sustainability Program Manager.

This procedure also applies to public involvement requirements contained in AM 707 Public Relations policy, the Resource Conservation and Recovery Act Permit; the Memorandum of Understanding Among the Bureau of Indian Affairs, the Department of Energy, and the Pueblo of San Ildefonso Regarding Monitoring; and the Emergency Planning and Community Right-to-Know Act. This IMP goes into effect on the issue date.

Communications and External Relation (CER) Division is the RO for environmental communications.

Purpose

The purpose of this procedure is to establish a formal process that LANL employees, organizations, and designated prime contractors will follow to implement a consistent process for communicating about environmental matters with internal and external interested parties.

Provisions

The Laboratory Director will hold Responsible Division Leaders accountable for implementation of this procedure.

The LANL Executive Board will:

- Endorse environmental communication policies and procedures
- Provide leadership in effective environmental communication
- Ensure workers have the necessary resources to implement this procedure

The Associate Director Technical Services (AD/TS) will:

- Approve environmental communication policies and procedures
- Provide leadership in effective environmental communication

The EMS Steering Committee will:

- Review and approve this procedure and determine EMS applicability
- Review financial and workload implications of this procedure
- Approve the communication plan for EMS-related environmental aspects
- Ensure that this procedure is followed

LANL Managers must:

- Communicate environmental and EMS requirements to workers
- Use Nested Safety Committees to Communicate EMS and environmental issues
- Provide leadership support for implementation of this procedure
- Work with ENV Division to ensure that Communication Plans are prepared for external (stakeholders, public, regulators, pueblos, etc) environmental events and publications
- Ensure that workers comply with this procedure

The Information Practices Office must:

- Coordinate the Laboratory's responses to DOE requests for environmental information under the Freedom of Information Act and similar California Acts
- Manage inactive and permanent records throughout the Laboratory at the Records Center

The CER Division must:

- Oversee Institutional communication policy and procedures
- Be the primary point of contact for environmental:
 - media releases and media inquiries
 - Federal, state, and local governmental communications
 - Tribal communications
 - LANL-wide environmental communications
- Work in partnership with ENV Division to respond to external inquiries
- Direct environmental inquiries except those listed above to the ENV Division Environmental Communication Project Lead (ECPL)

The Environmental Communication Person in Charge (ECPIC) is an informal role filled by anyone who is a lead for an environmental communication project or activity. The ECPIC will:

- Obtain approval from the ENV Division ECPL to assume the role of ECPIC for particular projects
- Implement this procedure in consultation with the ENV Division ECPL
- Coordinate all external communications through CER Division and ENV Division

All LANL workers must:

- Comply with this procedure when communicating with interested parties about environmental and EMS issues
- Coordinate external environmental communications with ENV Division and CER Division
- Work with ENV to develop Communication Plans when organizing external environmental events and publications.
- Provide feedback to supervisors on pollution prevention and environmental compliance
- Act as ECPIC if responsible for environmental communication projects

The ENV Division ECPL will:

- Be the point of contact for public involvement and external environmental communications
- Assist CER Division with media communications and preparing responses to intergovernmental and Congressional inquiries on environmental issues
- Track environmental communication and provide central records for Communication Plans
- Maintain the reading room and "Facility and Key Customer" Mailing Lists
- Ensure inquiries and responses are coordinated and answered in a thorough, timely manner
- Assist "First Point of Contact" to identify and approve the ECPIC best suited to manage a communication need, input, or inquiry
- Support ECPICs in the design and delivery of environmental communications
- Support the preparation of Communication Plans for public meetings, publications, presentations, and events

The ENV Division must:

- Coordinate all communications with regulatory agencies
- Maintain environmental communication policies and procedures
- Assign an ECPL and support staff as needed
- Plan and budget for external EMS communication in annual business planning activities
- Be the Institutional point of contact for regulatory meetings, public meetings, and DOE/National Nuclear Security Administration (NNSA) requirements for environmental communications
- Provide subject matter expertise for external environmental communications

- Comply with the public notice requirements of permit applications
- Establish and maintain a tracking system for recording and coordinating responses to inquiries from interested parties
- Evaluate and report on environmental communication performance to meet Appendix F requirements
- Transmit environmental communication issues to senior management
- Report on communication outcomes and success stories to LANL, regulators, DOE/NNSA, and the public

The EMS Manager will:

- Facilitate internal and external EMS communication
- Facilitate development of a communication plan for EMS-related environmental aspects for EMS Steering Committee approval

Communicate EMS requirements to contractors and subcontractors

PROCEDURE

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Identifying and Managing Environmental Communications.

This procedure describes the steps that will be used to manage environmental communications. The diagram below describes how the institution will respond to a communication need, input, or inquiry from External Interested Parties. If the activity involves significant external meetings or publications, a Communication Plan will be required, the development process for which is described in the next section.

Step 1. Identification of a communication need, input, or inquiry from External Interested Parties (*e.g., Public, Industry, Activists, Media, DOE, or NNSA*) or Internal Interested Parties (*e.g., UC Employees, Contractors, Researchers, LANL Managers, or Administrators*).

Step 2. First point of contact routes to appropriate line, program, and/or management (ECPIC). in consultation with the ENV Division ECPL.

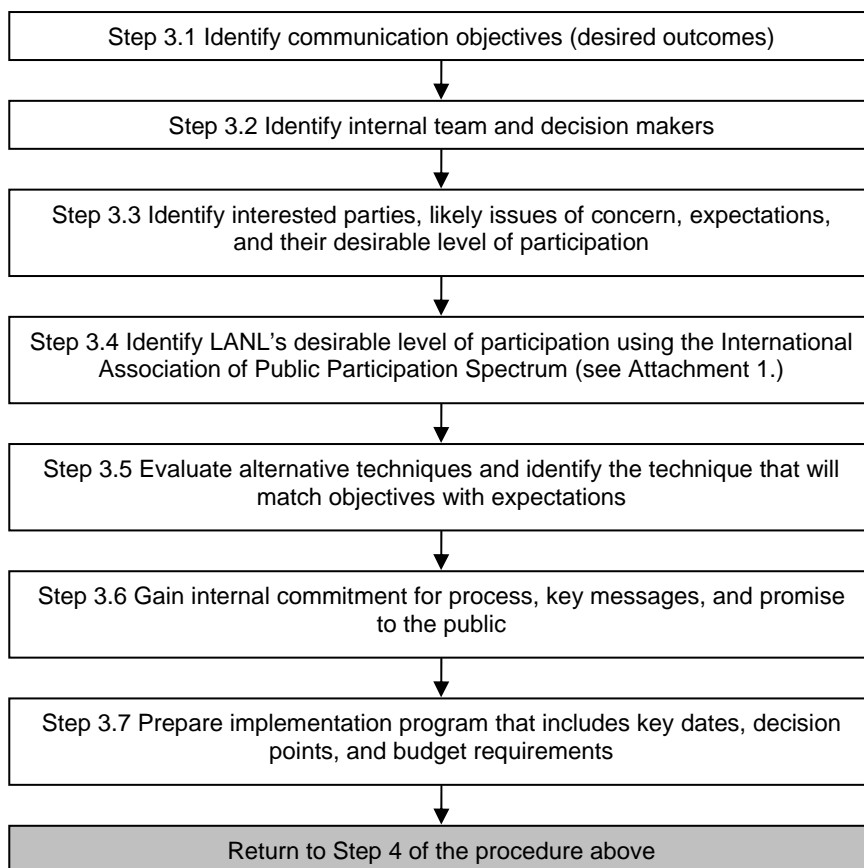
Step 3. The ECPIC plans and coordinates a response or activity in consultation with the ENV Division ECPL. If the activity involves significant external meetings or publications, a Communication Plan will be required.

Step 4. The communication process is implemented (*e.g., event, publication, or response to an inquiry*).

Step 5. The ECPIC monitors the process, documents feedback, provides follow-up to interested parties, evaluates success, and identifies lessons learned.

Step 6. The ECPIC reports on outcomes of the communication process and recommends process improvements to the ENV Division ECPL.

Recommended process for Communication Plan development



Review

The AD/TS must ensure that this procedure is reviewed annually and remains current. AD/TS may delegate this responsibility.

INSTRUCTIONS

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Exceptions and Variances

Unless otherwise noted in a specific document, LANL managers will consider exceptions or variances to this procedure on a case-by-case basis and will grant these only when demonstrated to be in the best interests of the institution.

To obtain an exception or variance from this Implementation Procedure:

- Managers may request an exception or variance from the AD/TS.
- Requests must be in writing, clearly identify the exception or variance sought, and provide a justification as to why this would be in the best interest of the institution.
- AD/TS will provide the requester a written response on the Directorate's decision.

Documents and Records

Office of Record.

The ENV Division ECPL must keep copies of documents and records produced from this procedure. These will include completed forms, plans, minutes of Divisions implementation meetings, and other records related to implementing this procedure. Divisions must keep copies of all records and documents submitted to the ENV Division ECPL.

Definitions

| Term | Definition |
|------------------------------|---|
| Communication | Exchange of information by, to, or between people or groups |
| EMS | The LANL Institutional Environment Management System |
| Environmental Aspect | A 'term of art' of the ISO 14001 International Standard. Define LANL activities, products, or services that have a positive, negative, or null interaction with the environment |
| Environmental Communications | Communications about environmental issues and projects |
| First Point of Contact | First point of contact for an environmental inquiry or initiator of environmental communication |
| Information | Data concerning an environmental activity that the Laboratory believes should be communicated promptly |
| Interested party | Individual or group concerned with or affected by the environmental performance of a project or activity |
| Media | Representatives of newspapers, television, and radio producers, magazines, writers, newsletter authors, and authors of books |
| Point of Contact | The person/Division that will act as the formal LANL representative in communications with external interested parties |

History

There are no prior versions of this procedure.

References**References for this document.**

- [ISO 14001](#), Environmental Management Systems – Requirements with Guidance for Use.
- [DOE Order 450.1](#), Environmental Protection Program.

Attachments

[Attachment 1](#), International Association of Public Participation Spectrum

Attachment 1
International Association of Public Participation Spectrum

